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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 JIEMEI CHEN,) No. C 05-0720 EDL
12 Plaintiff,)
13 v.) THIRD STIPULATION FOR EXTENSION
14 MICHAEL CHERTOFF, Secretary of the) OF TIME TO RESPOND TO COMPLAINT
15 Department of Homeland Security, et al.,) AND TO CONTINUE THE CASE
16 Defendants.) MANAGEMENT CONFERENCE;
17) ~~[PROPOSED]~~ ORDER

18 Subject to approval of the Court, the parties hereby stipulate as follows:

- 19 1. According to the records of the Department of Homeland Security, the Plaintiff's
beneficiaries are ready for fingerprinting and visa issuance as soon as certain requested
20 documents are received by the consulate in Ghangzhou, China.
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22 2. Plaintiff's husband has advised the consulate that he asked a friend to deliver the
documents in question to the consulate earlier this month. However, it does not appear that the
23 documents have been received by the appropriate section in the consulate. The parties are
attempting to track down the documents. Once this is accomplished, this case will be moot.
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25 3. In order to provide the parties additional time to resolve this issue and moot the case, we
request that the Court approve a third extension of time, up to and including September 1, 2005,
26 for the Defendants to respond to the Complaint. The parties also ask that the Court continue the
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1 case management conference from August 16, 2005 to September 20, 2005, in the expectation
2 that they can resolve the matter prior to the due date for the case management conference
3 statement. The parties recognize the Court's patience in granting two extensions to date, and we
4 anticipate that this will be the final extension request.

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6 DATED: July 27, 2005 Respectfully submitted,

7 KEVIN V. RYAN
8 United States Attorney

9 /s/ Sara Winslow
10 SARA WINSLOW
Assistant United States Attorney

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12 DATED: July 27, 2005 Respectfully submitted,
13 BAUGHMAN & WANG

14 /s/ Justin X. Wang
15 JUSTIN X. WANG
16 Attorneys for Plaintiff

17 **ORDER**
18 Pursuant to the stipulation of the parties and good cause appearing therefor, IT IS SO
19 ORDERED.

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21 DATED: July 27, 2005

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23 ELIZABETH D. LAPORTE
24 United States Magistrate Judge
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